## **CONFIDENTIAL**

August 24, 2009



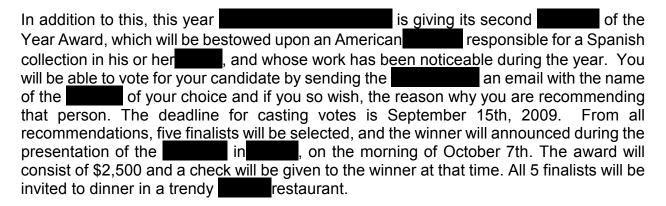
Re: Case No. 09035.Q

Dear :

immediate

You are the for the	
, and oversee the development and maintenance of the	
English and foreign language children's book collections (which inc	
buying books for the collection). On August 13, 2009, you sent email, dated July 16, 2009, from the	us an
. The has invited you, on behalf of the	
, to attend the, which will be held in	,
October 7-9, 2009. According to the materials you sent us, othe	
and have been extended the same invitation.	
expenses, including round-trip coach airfare, four	_
accommodation, show registration and admission tickets to all fair e will be paid jointly by and and . You have asked staff wheth	
City's Governmental Ethics Ordinance prohibits you from accepting	
offer.	ig tillo
, which is held annually, is the world's largest Spanish-lan	guage
book fair, drawing representatives of over 800 publishing houses, a	
as librarians, book sellers and distributors, authors and journ	
worldwide. In fact, this is the consecutive fair to which you or	other
personnel have been invited, and that we have addressed. At you will have the opportunity to improve your knowledge of and fam	iliarity
with the leading professionals—publishers, booksellers, distrib	,
authors, journalists, designers and dealers in the Spanish and	
American publishing world, as well as sharing ideas and experience	
	would
benefit the City and enhance your ability to perform your City dutie	s, and
that you have already received approval for attendance from the	
Commissioner and your	
supervisors.	

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Under § 2-156-040(d) of the City's Governmental Ethics Ordinance, City employees are not prohibited from accepting hosting expenses, including travel, meals and entertainment, if: (1) the expenses are reasonable; (2) the expenses are furnished in connection with public events, appearances or ceremonies related to official City business; (3) the expenses are furnished by the sponsor of the public event; and (4) the offer is not based upon any mutual understanding that the official decisions or actions of any City employee concerning the business of the City would be influenced.

Based on our review of the written invitation materials you sent us, staff concludes that all the conditions listed in § -040(d) of the Ordinance are met, and thus that the Ordinance does not prohibit you from accepting these travel and hosting expenses. Our conclusion is consistent with advice we have given to you and other similarly situated employees in the past. (See Case Nos. 08042.A, 07036.Q, 06041.Q, 05049.Q, 04038.Q, 03039Q.and 02029.Q). As you noted in your email (and as we have advised you in past years), you will, as a matter of policy, seek the approval of the Mayor's Chief of Staff for this trip, seeing that it is for overseas travel. Further, based on our review of the written invitation materials you sent us, there would be no prohibition on accepting the award if a Chicago described above.

Staff's conclusion does not necessarily dispose of all issues relevant to this situation, and is based solely on the application of the City's Governmental Ethics Ordinance to the facts stated in this letter. If the facts stated are incorrect or incomplete, please notify us immediately, as any change may alter our conclusion. Other laws or rules also may apply to this situation. Be advised that City departments have the authority to adopt and enforce rules of conduct that may be more restrictive than the limitations imposed by the Ordinance.

We appreciate your inquiry and your concern to abide by the standards embodied in the Ordinance. If you have any further questions, please do not hesitate to contact us.

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Very truly yours,

Steven I. Berlin Executive Director